

# EXHIBIT D

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

PAUL WILLIAMS-ISRAEL, Individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL  
ROBERTS, WILLIAM ROBERTS, and  
BELINDA NUCIFORA,

Defendants.

Case No.: 1:24-cv-07046-PK

Hon. Peggy Kuo

**DECLARATION OF DEAN GIBBONS IN SUPPORT OF HIS MOTION FOR  
APPOINTMENT AS LEAD PLAINTIFF**

I, Dean Gibbons, pursuant to 28 U.S.C. § 1746, declare as follow:

1. I respectfully submit this Declaration in support of my motion for appointment as Lead Plaintiff in the above-captioned securities class action (the “Action”) against Iris Energy Limited (“IREN”, “Iris Energy”, or the “Company”). I have personal knowledge about the facts stated herein and could competently testify to them if called to do so.

2. I currently reside in St. George, Utah. I possess a bachelor’s degree in Geography. I am currently self-employed and owner of the management company Chapman Investment Group, LLC. I have been investing in securities for fifteen years. Further, I have experience hiring and overseeing attorneys for business related matters.

3. I am both capable and qualified to serve as the lead plaintiff in the Action. By virtue of my significant financial interest in the resolution of the Action, I am motivated to litigate vigorously, efficiently, and to the best of my ability to maximize the potential recovery for myself and the Class I seek to represent.

4. Prior to seeking appointment as lead plaintiff in the Action, I communicated with Levi & Korsinsky, LLP about the lead plaintiff process, the responsibilities of a lead plaintiff, and how the Action would progress after a lead plaintiff is appointed. I understand that a lead plaintiff is required to direct the litigation on behalf of the Class, stay apprised of all material developments of the litigation, and act in the best interests of the Class throughout the litigation.

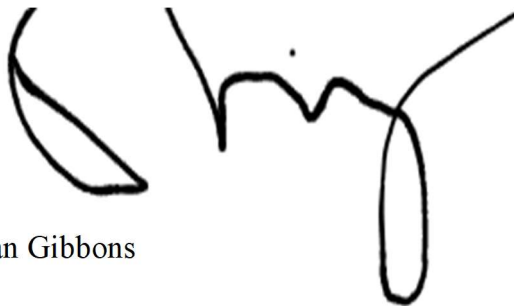
5. I understand that I was not required to seek appointment as lead plaintiff in order to recover. Rather, based on my financial interest, I decided to seek lead plaintiff appointment than remain an absent class member.

6. After discussing the responsibilities of serving as a lead plaintiff and being satisfied that Levi & Korsinsky, LLP would adequately serve as lead counsel based on the firm's experience, resources, and past successes, I signed a retainer agreement with Levi & Korsinsky, LLP, and authorized the firm to file a lead plaintiff motion on my behalf. I understand that my counsel is submitting this declaration along with a timely application for appointment as lead plaintiff on my behalf.

I declare under penalty of perjury that the foregoing is true and correct. Executed on:

Date: 11/19/24

Signed:

A handwritten signature in black ink, appearing to read 'Dean Gibbons', with a large, stylized loop at the end.

Name: Dean Gibbons